REMARKS

The final Office Action mailed November 14, 2006 noted that claims 1-38 were pending in the application and were rejected under 35 U.S.C. § 103(a). In rejecting the claims, U.S. Patent Nos. 6,635,088 to Hind et al. (hereafter, "Hind"); 7,043,686 to Maruyama et al. (hereafter, "Maruyama"); 5,504,891 to Motoyama et al. (hereafter, "Motoyama"); 5,999,929 to Goodman; 5,572,731 to Morel et al. (hereafter, "Morel"); and 6,507,874 to Tuniman et al. (hereafter, "Tuniman") were cited. Claims 1-39 remain in the claims.

On pages 2-10 of the Office Action, claims 1-6 and 11-30 were rejected under 35 U.S.C. § 103(a) as unpatentable over Hind in view of Maruyama. Hind relates to a method and system for reducing Extensible Markup Language (XML) and Document Type Definition (DTD) document file sizes using tags, where the size of tags wherein either or both of XML and DTD files is reduced. In particular, Hind defines the four subprocesses that parse a file encoded in a derivative of Standard Generalized Markup Language (SGML) as

> a subprocess for reading the encoded file; a subprocess for locating each of a plurality of tags in the encoded file; a subprocess for substituting a unique short tag for each unique one of the located tags in the encoded file; and a subprocess for storing a correspondence between each of the short tags and the located tag for which it was substituted

at column 4, lines 25-31. In other words, a tag compression technique is described that: (1) successively generates short names ("short tags") for original tag names ("located tags") appearing in a document file, (2) substitutes the short names for the original tag names, and (3) retains relationships between the original tag names and the short names in a table. Thus, it is clear from Hind that two lists of tags are used; a list of "unique short tags" and a list of "located tags in the encoded file" and "correspondence between each of the short tags and the located tag" are stored.

Independent claim 1, by contrast, recites "a tag list obtaining unit for obtaining only one tag list" at lines 3-4 and "an outputting unit for outputting said single tag list" at line 11. On its face, claim 1 compresses documents by obtaining and storing only one tag list and not a plurality of tag lists (*i.e.* "short tags" and "located tags" as disclosed in Hind). Therefore, it is submitted that Hind does not disclose "a tag list obtaining unit for obtaining a single tag list" as recited in lines 3-4 of claim 1.

In addition claim 1 recites "replacing all tags in ... structured documents with a *single* predetermined delimiter code" (lines 8-9, emphasis added). As indicated by the emphasized

19

word, only one predetermined delimiter code is used to replace different tags that appear in the structured documents. On the other hand, Hind discloses "storing a correspondence between each of the short tags and the located tag for which it was substituted" (column 4, lines 50-52). The apparatus recited in claim 1 cannot maintain such a correspondence, because only one predetermined delimiter code is used for "all tags in ... plural structured documents" (claim 1, lines 8-9). It is submitted that Hind does not teach or suggest substitution using only "a single predetermined delimiter code" and without mapping a relationship between short tags and located tags.

Nothing has been cited or found in Maruyama that teaches or suggests modifying the method disclosed by Hind to produce a single list of tags or perform substitution without relationship mapping. Therefore, it is submitted that Hind and Maruyama, individually or combined, do not teach or suggest all the features recited in claim 1.

Independent claims 4, 11-19 and 22-30 each recite "replacing each ... start markup tags and end markup tags ... with a single predetermined delimiter code". For the reasons discussed above, it is submitted that claims 4, 11-19 and 22-30 patentably distinguish over Hind and Maruyama individually or in combination.

Independent claim 3 recites "replacing said start markup tags and end markup tags ... with a single predetermined delimiter code" at lines 5-6. It is submitted, for the reasons discussed above, that claim 3 patentably distinguishes over Hind and Maruyama individually or in combination.

On pages 11-12, claims 7-10 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hind and Maruyama in view of Motoyama and Goodman. Claims 7-10 depend from independent claim 3 and thus, patentably distinguish over Hind and Maruyama for the reasons discussed above with respect to claim 3. Nothing was cited or found in Motoyama and Goodman suggesting modification of Hind and Maruyama to overcome the deficiencies discussed above. Therefore, it is submitted that claims 7-10 patentably distinguish over Hind, Maruyama, Motoyama and Goodman for the reasons discussed above.

On pages 12 and 13, claims 31, 32, 35 and 36 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hind and Maruyama in view of Morel. Claims 31, 32, 35 and 36 depend from claim 29 and thus, it is respectfully submitted that claims 31, 32, 35 and 36 patentably distinguish over Hind and Maruyama for the reasons discussed above with respect to claim 1, because claim 29 recites limitations similar to those discussed above with respect to claim 1.

Nothing was cited or found in <u>Morel</u> suggesting modification of <u>Hind</u> and <u>Maruyama</u> to overcome the deficiencies discussed above. Thus, it is further submitted that claims 31, 32, 35 and 36 patentably distinguish over <u>Hind</u>, <u>Maruyama</u> and <u>Morel</u> for the reasons discussed above.

On pages 13 and 14, claims 33, 34, 37 and 38 were rejected under 35 U.S.C. §103(a) as being unpatentable over <u>Hind</u> and <u>Maruyama</u> in view of <u>Tuniman</u>. Claims 33, 34, 37 and 38 depend from claim 29 and thus, it is respectfully submitted that claims 33, 34, 37 and 38 patentably distinguish over <u>Hind</u> and <u>Maruyama</u> for the reasons discussed above with respect to claim 29. Nothing was cited or found in <u>Tuniman</u> suggesting modification of <u>Hind</u> and <u>Maruyama</u> to overcome the deficiencies discussed above. Thus, it is further submitted that claims 33, 34, 37 and 38 patentably distinguish over <u>Hind</u>, <u>Maruyama</u> and <u>Tuniman</u> for the reasons discussed above.

The structured document compression method of new claim 39 recites "replacing each markup tag in a structured document with a single predetermined delimiter code" at lines 2-3 and "generating a tag file that strictly lists each markup tag in the order which it appears in the structured document" in lines 4-5. Thus, the document compression of new claim 39 creates two files, a structured document file that does not contain any markup tags and a tag file that strictly contains all the tags of the structured document in the order they appear in the structure document. In contrast, <u>Hind</u> disclosed a system which creates two types of tags, a short tag and a located tag, and stores "correspondence between each of the short tags and the located tag for which it was substituted" in column 4, lines 25-31. Thus, new claim 39 is patentably distinguishable over <u>Hind</u> because every markup tag in the structure document is given the same delimiter and the tag file only stores the markup tags in the order in which they appear in the structured document. The remaining prior art of record failed to teach or suggest the above patentable distinctions over <u>Hind</u>. Therefore, it is submitted that new claim 39 is patentably distinguishable over the prior art of record.

CONCLUSION

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome. There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.
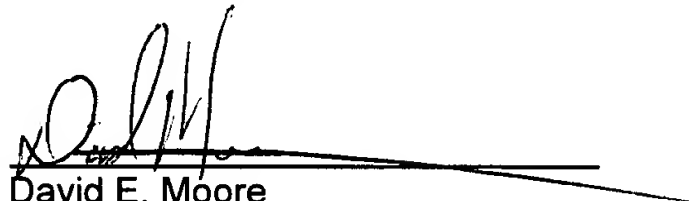
Respectfully submitted,

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